

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

AUG 19 2015

**U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS**

UNITED STATES OF AMERICA,

Plaintiff,

v.

No.

YOSHENG WANG A.K.A. "SHEN JIN WANG,"
GAO BAOZHEN A.K.A. "MING DONG," AND
TENG MA,

Defendants.

4:15CR396 HEA/SPM

INDICTMENT

COUNT 1

The Grand Jury charges that:

On or about July 16, 2015, in the Eastern District of Missouri, the defendants,

**YOSHENG WANG A.K.A. "SHEN JIN WANG,"
GAO BAOZHEN A.K.A. "MING DONG,"
AND TENG MA,**

being aided, abetted, counseled and induced by one another and others known and unknown to the Grand Jury, did knowingly possess and use, without lawful authority, a means of identification of another person, to wit, the account number of A.B. and L.B., during and in relation to the commission of the felony offenses of: production and use of counterfeit access devices, Title 18, United States Code, Section 1029(a)(1); fraudulent use of an access device, Title 18, United States Code, Sections 1029(a)(2); conspiracy to commit fraudulent use and possession of counterfeit and unauthorized access devices, Title 18, United States Code, Section 1029(b)(2); and, possession of 15 or more counterfeit and unauthorized access devices, Title 18, United States Code, Section 1029(a)(3).

In violation of Title 18, United States Code, Sections 1028A and 2.

COUNT 2

The Grand Jury further charges that:

On or about July 16, 2015, in the Eastern District of Missouri, the defendants,

**YOSHENG WANG A.K.A. "SHEN JIN WANG,"
GAO BAOZHEN A.K.A. "MING DONG,"
AND TENG MA,**

being aided, abetted, counseled and induced by one another and others known and unknown to the Grand Jury, in a matter affecting interstate commerce, did knowingly and with intent to defraud possess more than fifteen counterfeit and unauthorized access devices, that is: approximately 168 counterfeit access devices.

In violation of Title 18, United States Code, Sections 1029(a)(3) and 2.

COUNT 3

The Grand Jury further charges that:

On or about July 16, 2015, in the Eastern District of Missouri, the defendants,

**YOSHENG WANG A.K.A. "SHEN JIN WANG,"
GAO BAOZHEN A.K.A. "MING DONG,"
AND TENG MA,**

being aided, abetted, counseled and induced by one another and others known and unknown to the Grand Jury, in a matter affecting interstate commerce, did knowingly, and with intent to defraud, have custody and control over, and possess device-making equipment, to wit: a laptop computer and a credit card reader/writer.

In violation of Title 18, United States Code, Sections 1029(a)(4) and 2.

A TRUE BILL.

FOREPERSON

RICHARD G. CALLAHAN
United States Attorney

TRACY BERRY, #014753 TN
Assistant United States Attorney